



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 13, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

The Government respectfully submits this letter regarding the question whether the pending privilege issue could be resolved by a stipulation regarding the testimony of Robert Glassman. After considering the issue and conferring with defense counsel, the Government remains of the view that the statement in the email is not admissible and requires additional context for it to be understandable by the jury. (*See Gov't Letter at 7-8, Dkt. No. 528; 12/6/21 Letter from Robert Glassman at 3-4*). Accordingly, the Government would not enter into such a stipulation.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _____ s/

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Cc: Defense Counsel (by ECF)